



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 6, 1991

Mr. Danny L. Gray, President
KBK Enterprises, Inc.
1000 Cobb Place Boulevard, Bldg. 400
Kennesaw, Georgia 30144

Dear Mr. Gray:

Re: Review of Application for Permit Amendment, Materials Energy Research & Recovery Corp., d.b.a. USPCI, Marblehead Mtn. Limestone Processing Facility, M/045/024, Tooele County, Utah

The Division has completed its review of your recent permit amendment application to revise the mining and reclamation plan for the Marblehead Mtn. Limestone Processing Facility. Please accept my sincere apology for the unforeseen delay in forwarding our response to you. The plan has been found conceptually complete and the Division is prepared to grant a conditional approval of the plan. The following conditions will need to be addressed before the Division can consider issuing its final approval for the amendment:

1. The operator will need to perform an assessment of the volume of stockpiled clayey lime waste fines from the secondary crusher. This information is required to assess whether the proposed 6-inch depth of material should/could be increased to assist in securing the success of onsite revegetation efforts.
- * Pursuant to our telephone conversation on August 1, 1991, it is my understanding that you have already completed these volumetric measurements.
2. The waste fines from the secondary and tertiary crusher stockpiles must be analyzed for soil properties to determine if supplemental amendments or soil nutrients are necessary to enhance revegetative success.
- * It is my understanding that you have received our suggested list of soil parameters to be evaluated and that appropriate samples have been taken and analyzed. Please provide us with a copy of the analyses for evaluation.

3. The Division concurs and supports the operator's proposal to pre-strip those areas where limestone crusher fines have already been emplaced and set the material aside for use in burying the kiln lime scale material. If the pre-stripping can also excavate the underlying natural soil, this material should also be stockpiled for eventual reclamation of the buried scale material. The scale should be buried at least 3 feet below the regraded surface.
4. The Division also supports the operator's proposal, as discussed during the recent inspection, to set aside an area on a portion of the regraded area (closer to the plant site) and set up another revegetation test plot. We would be pleased to work with you in establishing a plan and choosing a location should you choose to proceed with this proposal.

During the May 17, 1991 onsite inspection of the current revegetation test plot, an inadequacy was noted in the fence installed around the plot. The fence is not adequate to preclude the intrusion of grazing animals (deer, antelope, sheep, cattle, etc.). Hoof prints (antelope ?) were observed within the enclosure during the inspection. The fence must be modified to prevent wildlife and domestic grazing animals from accessing the test plots. I have enclosed a suggested fence design that could be used by the operator. Any reasonable variation of this design that will provide similar protection may be used.

Until such time as a more site-specific reclamation seedmix is developed based upon results of onsite revegetation test plots, the following seedmix recommendation is provided:

<u>Common Name</u>	<u>Species</u>	<u>Rate (lbs. - PLS)</u>
Bluebunch wheatgrass	Agropyron spicatum	3.0
Western wheatgrass	Agropyron smithii	3.0
Indian ricegrass	Oryzopsis hymenoides	2.0
Sand dropseed	Sporobolus coeyptandrus	0.25
Lewis flax	Linum lewisii	1.0
Yellow sweetclover	Melilotus officinalis	1.5
Palmer penstemon	Penstemon palmeri	0.5
Fourwing saltbush	Atriplex canescens	2.0
Rubber rabbitbrush	Chrysothamnus nauseosus	0.5
** Broadcast rate	TOTAL LBS. (PLS)	13.75

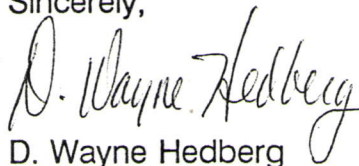
Page 3
Mr. Danny L. Gray
M/045/024
August 6, 1991

5. Mr. Minchey suggested during the May 17, 1991 inspection that the smaller stockpile(s) of topsoil/subsoil(?) material located adjacent to the road on the southern end of the plant area (behind the kilns), could be "blended" with the proposed 2-foot cover of rejected crusher fines material. The Division supports this proposal as a means of extending/enhancing the vegetation success of the limestone fines.
6. During a more recent site inspection (June 26, 1991), Mr. Minchey indicated that there were some areas (undergoing regrading/recontouring) that do not accurately reflect what was depicted on the proposed amendment drawings. During our August 1, 1991 telephone conversation, you also confirmed that the topographic drawing is being revised to reflect the appropriate changes. Please provide the Division with the appropriately revised drawings.
7. On page 2 of the amendment proposal, the plan discusses compacting of the 2-foot limestone fines and soil cap over the reclaimed area(s). The Division discourages compacting of the soil surface. The recontoured surface should be ripped (1 - 2 feet) prior to seeding and scarified after seeding to assure proper seed/soil contact. Soil compaction will inhibit root penetration and limit seedling establishment.

Given the highly calcarious nature of the limestone fines and the tendency for soil incrustation, the Division would suggest incorporation of a mulch into the upper 6-12 inches of the limestone and soil cap.

Thank you for your patience and cooperation in finalizing this permitting action. Please feel free to call me should you have questions or concerns with the content of this letter.

Sincerely,



D. Wayne Hedberg
Permit Supervisor
Minerals Reclamation Program

jb

Enclosure

cc: Jack Minchey, JTM Industries, Inc.
Lowell Braxton, DOGM
Minerals staff

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